United States Bankruptcy Court Western District of Texas San Antonio Division

IN RE:	Case No. <u>09-52593 RBK</u>
RICARDO D. CORTEZ, JR., and CHRISTINA M. CORTEZ,	Chapter
DEBTORS	

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY OF ACT AGAINST PROPERTY

Ricardo D. Cortez, Jr. and Christina M. Cortez ("Debtors") respond to the Motion for Relief From Automatic Stay of Act Against Property ("Motion") filed by Wells Fargo Bank, N.A. ("Movant") and would show the Court as follows:

- 1. Debtors admit the allegations in paragraph 1 of the Motion.
- 2. Debtors admit the allegations in paragraph 2 of the Motion.
- 3. Debtors deny the allegations in paragraph 3 of the Motion, except that Debtors admit the documents are true copies of the original documents.
- 4. Debtors deny the allegations in paragraph 4 of the Motion.
- 5. Debtors deny the allegations in paragraph 5 of the Motion.
- 6. Debtors deny the allegations in paragraph 6 of the Motion.
- 7. Debtors deny the allegations in paragraph 7 of the Motion.

WHEREFORE, Debtors request the Court to deny the relief sought by Movant in the Motion, and for such other relief as the Court deems proper.

Respectfully submitted,

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on August 13, 2009, a true and correct copy of the Response to Motion for Relief From Automatic Stay of Act Against Property was sent to the following parties via electronic means as listed on the court's ECF noticing system or by first class mail:

Brice, Vander Linden & Wernick PC 9441 LBJ Freeway, Suite 350 Dallas, TX 75243

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